

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-223 (NEB/DTS)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**GOVERNMENT'S PROPOSED  
VOIR DIRE QUESTIONS**

1. AIMEE MARIE BOCK,
3. SALIM SAID,
4. ABDULKADIR NUR SALAH,
- AND
6. ABDI NUR SALAH,

Defendants.

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Joseph H. Thompson, Matthew S. Ebert, Harry M. Jacobs, and Daniel W. Bobier, Assistant United States Attorneys, respectfully submits the attached list of proposed voir dire questions to be presented to the prospective jurors to be examined in this case, under the procedures set forth in Federal Rule of Criminal Procedure 24(a).

Dated: January 10, 2025

Respectfully Submitted,

ANDREW M. LUGER  
United States Attorney

BY: /s/Joseph H. Thompson  
JOSEPH H. THOMPSON  
MATTHEW S. EBERT  
HARRY M. JACOBS  
DANIEL W. BOBIER  
Assistant United States Attorneys

**Basic Background**

1. Please state your name, where you live, and your occupation. Have you had any other occupations during the past 5 years? If so, what are they? If retired, what was your occupation before retiring?
2. Please provide the same information as to your spouse/partner and adult children.
3. If you have children or grandchildren, what are their ages and genders?
4. Where were you born and raised?
5. What is your educational background?
6. Have you ever served in the military? If so, please describe where, when, and in what branch you serve(d).
7. What are your favorite hobbies or favorite activities? Do you belong to any organizations, groups, or churches/synagogues/mosques/temples? If so, which ones and what is the extent of your involvement?
8. What are your main sources of news?
9. Are there any magazines, newspapers, blogs, or Internet sites that you read on a regular basis? If so, please describe.
10. What radio, television, or Internet programs, if any, do you listen to or watch on a regular basis?
11. What podcasts, if any, do you listen to on a regular basis?
12. Do you regularly watch any law-related programs (factual or fictional programs, such as Law & Order)? Which ones? Based on the programs you watch, have you formed an opinion regarding the type of evidence necessary for the

government to satisfy its burden of proof? If so, can you put those opinions aside and decide the case based only on the evidence presented in the courtroom during the course of this trial?

**Knowledge of the Case and Case Participants**

13. Have you heard of this case before today? Is so, when and how? Have you developed an opinion on the guilt or innocence of the defendants? If selected as a juror in this case, will you be able to set aside what you may have learned through other sources and decide the case based only on the evidence presented during the trial?

14. Are you acquainted with the defendants Aimee Marie Bock, Abdikerm Eidleh, Salim Said, Abdulkadir Nur Salah, Ahmed Omar-Hashim, Abdi Nur Salah, Abdihakim Ali Ahmed, Ahmed Artan, Abdikadir Abshir, Abdinadir Abshir, Asad Abshir, Hamdi Hussein Omar, Ahmed Ghedi, and Abdirahman Ahmed, or their lawyers, Kenneth Udoibok, Surya Saxena, Michael Colich, Adrian Scott LaFavor-Montez, and Brian Toder?

15. Are you acquainted with the lawyers for the United States, Joseph Thompson, Matthew Ebert, Harry Jacobs, and Daniel Bobier, or the case agents, Special Agents Jared Kary and Travis Wilmer, or Forensic Accountant Pauline Roase, with the Federal Bureau of Investigation (FBI)?

16. Do you know any of the other prospective jurors?

17. Do you know any of the prospective witnesses? [*Read witness list*]

18. Are you acquainted with the Judge or her court staff?

**Previous Jury Service**

19. Have you previously served as a juror on a case? How many cases?
20. Was the prior case(s) a criminal or civil matter? What was the nature of the case(s)? When did you serve? Was the prior case in federal or state court?
21. In the prior case, did you reach a verdict? What was the verdict? Were you the foreperson?
22. Was there anything about your previous jury experience that would lead you to feel that you may have some prejudices either for or against the United States or the defendants in this case? Is there anything about that experience that would affect your approach to this case?

**Previous Contact with the Legal System or Criminal Justice System**

23. Have you, your relatives, close friends, or neighbors ever worked in law enforcement, such as a police officer, deputy sheriff, or federal agent?
24. If so, is there anything about your experience or relationship with these individuals that would affect your approach to this case?
25. Do you have any legal training? Have you taken any law-related courses in school? If so, please describe.
26. Do you have any law enforcement training? If so, please describe.
27. Do you have any relatives, close friends, or neighbors who are lawyers, judges, or are employed in another job within the legal profession?
28. Have you ever testified in court? Is there anything about that experience that would affect your approach to this case?

29. Have you, your relatives, close friends, or neighbors had any type of encounter with any law enforcement agency, including as the victim of a crime (reported or unreported) or a witness to a crime? What was the nature of the encounter? Were you satisfied with the manner in which the matter was resolved? Why or why not?

30. Have you, your relatives, close friends, or neighbors ever been accused, investigated, charged with, or convicted of a crime? What was the nature of the crime? Do you believe that law enforcement officials and the court properly handled the matter? Why or why not?

31. Have you, your relatives, close friends, or neighbors had any type of encounter with the FBI? What was the nature of the encounter? Were you satisfied with the manner in which the matter was resolved? Why or why not?

32. Some of the witnesses in this trial are likely to be law enforcement officers. Do you have any prejudices either against or in favor of law enforcement officers? If so, what are they?

33. Do you have any strong feelings, positive or negative, regarding the United States Department of Justice or the United States Attorney's Office?

**Case Specific**

34. Have you, your relatives, or close friends ever worked for or heard of any of the following entities: Feeding Our Future, Safari Restaurant, Cosmopolitan Business Solutions, ASA Limited, Olive Management, Stigma-Free International, Bet on Better Future, Horseed Management, or Tunyar Trading?

35. Have you ever heard of the Summer Food Service Program or the Child and Adult Care Food Program? If so, what does that mean to you? Have you or anyone you know participated in that program?

36. Did you, your relatives, or close friends receive meals from childcare centers, daycare homes, schools, or after-school programs during the COVID-19 pandemic?

37. Have you, your relatives, or close friends ever owned a business?

38. Have you, your relatives, or close friends ever owned a restaurant?

39. Have you, your relatives, or close friends ever provided meals to children enrolled in school?

40. Have you or any of your close friends or relatives ever participated in, belonged to, or otherwise supported any organization that advocates for the liberalization of laws prohibiting defrauding government-sponsored public federal programs, including food subsidies? If not, do you agree with the beliefs of any such organizations?

41. Have you, your relatives, close friends, or neighbors ever been a victim of a wire fraud, money laundering, federal programs bribery, or passport fraud-related crimes? Was the matter reported to law enforcement? Do you believe that you were treated fairly by the criminal justice system? Is there anything about your situation that would affect your approach to this case?

42. Have you, your relatives, close friends, or neighbors ever been accused, investigated, charged with, or convicted of a wire fraud, money laundering, federal programs bribery, or passport fraud-related crime? Was the matter reported to law

enforcement? Do you believe that you were treated fairly by the criminal justice system? Is there anything about your situation that would affect your approach to this case?

**Following Instructions and Service as a Juror**

43. If selected as a juror in this case, will you apply the law as given by the Court, regardless of whether you agree or disagree with it?

44. Do you generally approve or disapprove of the operation of the criminal justice system in the United States?

45. Do you believe that there are certain crimes that should be legalized? If so, please explain your answer.

46. Do you have any moral, religious, or personal beliefs which would make it difficult for you to be a fair and neutral juror in this case?

47. Do you have any difficulties understanding or communicating in the English language?

48. Do you have any mental or physical conditions which would make it difficult for you sit as a juror? Do you have a problem with your hearing, your eyesight, with having to sit for most of the day, or any disability which would in any manner prevent you from either hearing, seeing, or concentrating on the evidence presented at trial?

49. Based upon the discussions you have heard during voir dire, is there any reason why you feel you cannot be a fair and impartial juror in this case?